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Garyg Miller/R6/USEPA/US

06/02/2008 12:02 PM

To
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Subject
Fw: Gulfco Marine Maintenance Superfund Site

Eric,

The following testing will be necessary for the ecological risk assessment/evaluation at Gulfco, with scheduling based on the timeline being work out now. Please let me know if you have any questions on this.

Regards,

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Jon Rauscher/R6/USEPA/US

05/30/2008 05:35 PM

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Subject
Gulfco Marine Maintenance Superfund Site

Susan Roddy discussed the accelerated schedule of the Gulfco Marine Maintenance Superfund site. The schedule that Susan was provided has the draft Engineering Evaluation/Cost Analysis (EE/CA) completed by July 2, 2008 and the Record of Decision completed by September 29, 2008. With this accelerated schedule, we realized that for you to make an informed ecological risk management decision that critical ecological risk assessment information needs to be collected in a timely manner.

Susan and I conferred with Jessica White, Region 6 Coastal Resource Coordinator for the National Oceanic and Atmospheric Administration (NOAA), and Larry Champagne, Texas Commission on Environmental Quality (TCEQ) contact for Ecological Risk Assessment, regarding critical data needs for the ecological risk assessment portion of the EE/CA. We agreed that additional data that would need to be collected for the ecological risk assessment include a chronic amphipod and polychaete sediment toxicity tests, and whole body chemistry for fiddler crabs. A statistically relevant sample size (e.g., minimum of 10) would need to be collected for all the toxicity tests and fiddler crabs.

We recommend that a chronic amphipod sediment toxicity test and a chronic polychaete sediment toxicity test should be conducted. The standard EPA method for chronic toxicity testing calls for a 28-day test (e.g., Method for Assessing the Chronic Toxicity of Marine and Estuarine Sediment-associated Contaminants with the Amphipod *Leptocheirus plumulosus* (<http://www.epa.gov/waterscience/cs/guidancemanual.pdf>)). Due to the proposed deliverable date for the EE/CA of July 2, we would accept that these chronic tests could be abbreviated to 21 days. Sediment chemistry data should be collected simultaneously and co-located with the sediment collected for the sediment toxicity tests to be able to fully interpret the toxicity test information.

In addition to the sediment toxicity testing, we recommend that fiddler crabs should be collected for analysis of tissue chemistry. The fiddler crabs need to be analyzed for whole body chemistry. Sediment chemistry data would need to be collected simultaneously and co-located with the collection or capture location of fiddler crabs.

To meet the accelerated schedule, these samples would need to be collected early in the week of June 2 in order to meet the deadline for submittal of the EE/CA by July 2.

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